

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

<b>POLICE NO. :</b>	068550
<b>PROSECUTOR NO. :</b>	095471574
<b>OCN:</b>	

<b>STATE OF MISSOURI,</b>	)	
	)	<b>PLAINTIFF,</b>
<b>vs.</b>	)	
	)	
<b>JORDAN D. HUFF</b>	)	
<b>4524 Cambridge Ct.</b>	)	<b>CASE NO. 2216-CR</b>
<b>Kansas City, MO 64110</b>	)	<b>DIVISION</b>
<b>DOB: 10/18/1998</b>	)	
<b>Race/Sex: B/M</b>	)	
	)	
	)	
	)	<b>DEFENDANT.</b>

**COMPLAINT**  
**WARRANT REQUESTED**

**Count I. Murder 2nd Degree (565.021-001Y20200903.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.021, RSMo, committed the class A felony of murder in the second degree, punishable upon conviction under Section 558.011, RSMo, in that on or about on or about October 1, 2022, in the County of Jackson, State of Missouri, the defendant, with the purpose of causing serious physical injury to James P. Robertson, caused the death of James P. Robertson by shooting him.

An individual convicted and sentenced for this offense shall not be eligible for parole until eighty-five percent of the sentence is served.

The range of punishment for a class A felony is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than ten (10) years and not to exceed thirty (30) years, or life imprisonment.

**Count II. Armed Criminal Action (571.015-001Y20205299.0)**

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section 571.015.1, RSMo, in that on or about on or about October 1, 2022, in the County of Jackson,

**State vs. Jordan D. Huff**

State of Missouri, the defendant committed the felony of murder in the second degree charged in Count One, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of murder in the second degree by, with and through, the knowing use, assistance and aid of a deadly weapon.

The punishment imposed pursuant to Section 571.015, RSMo shall be in addition to and consecutive to any punishment provided by law for the crime committed by, with, or through the use, assistance, or aid of a dangerous instrument or deadly weapon. The range of punishment for the offense of Armed Criminal Action in violation of section 571.015.1, RSMo. is imprisonment by the department of corrections for a term of not less than three years and not to exceed fifteen years, unless the person is unlawfully possessing a firearm, in which case the term of imprisonment shall be for a term of not less than five years. No person convicted under this subsection shall be eligible for parole, probation, conditional release, or suspended imposition or execution of sentence for a period of three calendar years.


The facts that form the basis for this information and belief are contained in the statement(s) of facts filed contemporaneously herewith, made a part hereof, and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

**JEAN PETERS BAKER**  
Prosecuting Attorney  
Jackson County, Missouri  
by,

*/s/ Jacob S Hjelmaas*  
Jacob S Hjelmaas (#71003)  
Assistant Prosecuting Attorney  
321 W Lexington  
Independence, MO 64050  
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JHjelmaas@jacksongov.org

**WITNESSES:**

1. PO Amanda Anderson, 223 N. Memorial Drive, Independence, MO 64050
2. JAMES P ROBERTSON, Prosecuting Atty. Office, 415 E 12th St, Floor 11, Kansas City, MO 64106
3.   
64106
4. PO Christopher Stewart, 223 N. Memorial Drive, Independence, MO 64050

## PROBABLE CAUSE STATEMENT

FILED  
DIVISION 34

03-Oct-2022 16:13

CIRCUIT COURT OF JACKSON COUNTY, MO

BY \_\_\_\_\_

Date: 10/2/2022

Report #: 2022-68550

I, Amanda Anderson, a Detective with the Independence, Missouri, Police Department, ~~knowing that false statements on this form are punishable by law, state that the facts contained herein are true.~~

1. I have probable cause to believe that on 10/1/2022, at 2132 hours, Jordan D Huff, (Race- Black, Sex- Male, DOB- 10/18/1993, Address-4524 Cambridge Ct, Kansas City, MO 64110, [REDACTED], committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

On 10/1/2022 at approximately 2132 hours, Independence Police Officers were dispatched to 3919 S Redwood Drive Apt E, Independence, MO 64057, in regard to a shooting. Prior to police arrival, the caller advised a 25-year-old male had been shot and didn't have a pulse.

PO D. Thompson advised a black female, identified as [REDACTED], exited the residence, stating that [REDACTED] had been shot. Her three children (ages 4, 3, and 1) were located in a bedroom, unharmed. Fire and Medical personnel responded inside and determined the victim, James P Robertson, to be deceased.

James Robertson was located in the living room, deceased from multiple apparent gunshot wounds. It was determined that there were approximately four gunshots to his arm and chest/back area. There were 7-8 small bullet holes in the kitchen drywall, that exited the apartment. There were additional small bullet holes that went through the living room drywall and into the bedroom where the children were located.

There were eight bullet holes in the exterior of the 2<sup>nd</sup> floor apartment (E). Across and into an adjacent apartment building, there were multiple impact sites. It appeared that at least three impact sites hit 3931 S Redwood Dr Apt A, into a glass window and at least two impact sites hit 3931 S Redwood Dr Apt B, with one going into a glass window.

Crime Scene Unit responded and took a scan diagram of the apartment, numerous digital photographs, and collected evidence from the scene, including ten .223 caliber spent shell casings from the living room area. They also took digital photographs of the exterior of the building where the bullet rounds exited the building and struck the adjacent building.

Independence Detective A. Anderson #1273 conducted an interview of [REDACTED] at Police Headquarter. [REDACTED] stated he, [REDACTED] James Robertson, [REDACTED], and his cousin Jordan Huff, were at [REDACTED] house eating dinner, drinking and smoking marijuana. He stated after dinner, they started playing various drinking card games, including Drunk Uno and Spades. [REDACTED] stated at one point during the game, he got up to use the restroom and while in there, he heard several gunshots. He stated when he exited the bathroom, [REDACTED] was exiting her children's room and telling him to call the police because Huff had just killed James. [REDACTED] stated at that time, he observed James to be on the floor in the living room in a pool of blood and that Huff was in the living room/kitchen area, pacing, with his black AR-15 rifle in his hands, and pointing it towards them. He stated he went to get his phone from the table area to call the police, however, Huff stopped him and demanded he give Huff his cell phone and the keys to his 2018 Kia Sorento. [REDACTED] stated he initially refused; however, Huff pointed the AR-15 at him and told him again to give him his cell phone and car keys. [REDACTED] stated he had his own handgun in his bag, on his person, however, Huff had the AR-15 rifle pointed at him and he didn't want Huff to kill him.

[REDACTED] stated Huff is an alcoholic, Schizophrenic, and has a history of domestic violence towards his mother and other sister. He stated after KCPD confiscated his weapons after a domestic violence incident, once the case

was dismissed on 8/1/22, Huff ‘upped the ante’ and purchased two new firearms and carried the AR-15 rifle everywhere with him on a sling or in a black and blue large duffle bag with drawstring. ██████ stated there was another incident a few weeks ago where Huff pointed a firearm at another family member, and that he had shot the counter at his residence during another altercation just last week.

Independence Detective R. Brady #940 conducted an interview of ██████ stated she was at her ██████ residence with her three children, ██████ James Robertson, ██████ and ██████ Jordan HUFF ██████ drove her Pathfinder from her mother’s residence to her apartment with her children, James Robertson drove her Chevy Impala to her apartment and ██████ drove himself and HUFF to her apartment in a Kia. She stated the children were playing in their bedroom, while the adults were playing card drinking games, Uno, and spades in the front room of the apartment at a small square table. The males were drinking alcohol and smoking marijuana.

████████ stated that ██████ got up to go to the bathroom and laid his hand of cards faceup on the table. ██████ stated that HUFF commented on the faceup hand of cards, and that the others laughed, and HUFF grabbed the cards and crumpled them up. HUFF grabbed his firearm from one of the sofas, which ██████ described as two handled long with holes on it approximate one foot in length and that it was an AR style.

████████ stated HUFF fired several rounds in her the kitchen of her apartment, so she went to the children’s bedroom to put them in the closet and had them lay down. ██████ stated as she was exiting the children’s bedroom, ██████ was coming out of the bathroom asking what was going on. ██████ stated she saw HUFF shoot James Robertson and James Robertson fall to the floor.

████████ stated she tried to call 911 but that HUFF pointed the firearm at her and grabbed the cordless house phone from her hand, preventing her from calling immediately. ██████ stated HUFF took ██████ cell phone and keys to his Kia and left the apartment.

There is a RING doorbell camera on the outside of Apt E and ██████ provided the video of HUFF entering and exiting her apartment. ██████ can be seen exiting the apartment, quickly followed by Huff. The muzzle of a barrel can be seen in Huff’s hands as he exits the apartment. Once in the breezeway, Huff is heard asking and demanding ██████ keys and phone. ██████ then exits the apartment and screams ‘Help!’

████████ 2018 Kia Sorento is entered as stolen in conjunction with a Robbery and Murder. On 10/2/22 at approximately 0930 hours, the vehicle was recovered at 7333 S Myrtle by KCPD and towed for processing to a secure Independence Police Department facility.

Preliminary Medical Examiner findings show James Robertson has a gunshot wound to his right forearm and to his back, in which there is stippling around both wounds. There is also a gunshot wound to James Robertson’s chest.

Detective Amanda Anderson

/s/ Amanda Anderson

Print Name

Signature